

Ex. C

From: [Burden, Ashley](#)
To: ["Jeremy Ruth"](#)
Cc: [Streit, Elizabeth M.](#); [Patrick, Joseph J](#); [Platt, Joseph](#)
Subject: RE: [EXTERNAL] Re: CFTC v. Long Leaf Trading Group, Inc. et al., No. 20 cv 3758 (N.D. Ill.) | deposition of Defendant Jeremy Ruth
Date: Friday, March 12, 2021 5:12:53 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
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[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image007.png](#)
[image013.png](#)

Mr. Ruth:

I hope this email finds you well. The CFTC cannot accommodate your request to extend the discovery deadline through December 15, 2021. As you are aware, the CFTC and counsel for Donelson and Long Leaf have agreed to propose a June 30, 2021 discovery deadline, pursuant to the Court's order of February 16, 2021. In communicating this agreement to the courtroom deputy, my co-counsel, Mr. Platt, noted your objection to that deadline and your desire for a later one.

With respect to your deposition, the CFTC cannot accept your refusal to commit to a date certain.

Please be advised that the CFTC will be filing a motion to compel your appearance at a remote deposition on May 19, 2021, as per the revised notice of deposition. We will likely file some time next week. You can of course obviate the need for our motion by proposing a reasonable deposition date that falls within our proposed June 30 discovery deadline.

Thanks,

A



Ashley J. Burden

Senior Trial Attorney/Chicago Regional Office
Division of Enforcement

Commodity Futures Trading Commission

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aburden@cftc.gov



From: Jeremy Ruth <jeremysruth@hotmail.com>

Sent: Friday, March 12, 2021 8:34 AM

To: Platt, Joseph <JPlatt@CFTC.gov>

Cc: Jim Falvey <jimfalvey@yahoo.com>; Streit, Elizabeth M. <estreit@CFTC.GOV>; Burden, Ashley <ABurden@CFTC.gov>; Patrick, Joseph J <JPatrick@CFTC.gov>; 'adnelson0503@gmail.com' <adnelson0503@gmail.com>

Subject: [EXTERNAL] Re: CFTC v. Long Leaf Trading Group, Inc. et al., No. 20 cv 3758 (N.D. Ill.) | deposition of Defendant Jeremy Ruth

Joseph,

As I mentioned before I can not commit to a deposition date as I have not received any discovery and it is unknown if I can view discovery in the format you have proposed that you send it to me. Furthermore, in the event I receive discovery in the near future, me being 1 person and there being over 750K documents to review your timeline for my deposition, all other depositions, and the fact discovery deadline is completely unrealistic for me to be prepared to defend myself in this matter.

With that said, I propose that the fact discovery deadline be pushed back to December 15th 2021. As for the scheduling of my deposition and all others, I propose that they be tabled till I have received your productions and can confirm that I can access the documents in the format produce to me.

Please let me know your thoughts

Sincerely,

Jeremy Ruth

From: Platt, Joseph <JPlatt@CFTC.gov>

Sent: Thursday, March 11, 2021 6:00 PM

To: Jeremy Ruth <jeremysruth@hotmail.com>

Cc: Jim Falvey <jimfalvey@yahoo.com>; Streit, Elizabeth M. <estreit@CFTC.GOV>; Burden, Ashley <ABurden@CFTC.gov>; Patrick, Joseph J <JPatrick@CFTC.gov>; 'adnelson0503@gmail.com' <adnelson0503@gmail.com>

Subject: RE: CFTC v. Long Leaf Trading Group, Inc. et al., No. 20 cv 3758 (N.D. Ill.) | deposition of Defendant Jeremy Ruth

Mr. Ruth –

Please see the attached deposition notice concerning your deposition in the above-referenced case.



Joseph C. Platt
Trial Attorney, Division of Enforcement
Commodity Futures Trading Commission
C: 773-241-1543
jplatt@cftc.gov


From: Platt, Joseph

Sent: Tuesday, March 9, 2021 11:42 AM

To: 'Jeremy Ruth' <jeremysruth@hotmail.com>

Cc: 'Jim Falvey' <jimfalvey@yahoo.com>; Streit, Elizabeth M. <estreit@CFTC.GOV>; Burden, Ashley <ABurden@CFTC.gov>; Patrick, Joseph J <jpatrick@cftc.gov>

Subject: CFTC v. Long Leaf Trading Group, Inc. et al., No. 20 cv 3758 (N.D. Ill.) | deposition of Defendant Jeremy Ruth

Mr. Ruth –

Given your request to reschedule your deposition, we are cancelling the court reporter for this Friday and we will take your deposition at some as-yet-to-be-determined date in the near future. Since you have not proposed an alternative date, we are proposing to reschedule your deposition for the third week of May (5/17 – 5/21). If you have any conflicts during that week, let us know by this Thursday, 3/11. If we don't hear from you, we will send you a deposition notice for a date of our choosing.

Relatedly, we have proposed to Defendants Long Leaf Trading Group and James Donelson to move the fact discovery deadline back to June 30. Let us know by this Thursday, 3/11, if you have a position on that proposed modification to the case's scheduling order. If we do not hear back from you by Thursday, 3/11, we will report to the Court that you do not have a position on the requested change to the deadline.

Regards,



Joseph C. Platt
Trial Attorney, Division of Enforcement
Commodity Futures Trading Commission
C: 773-241-1543
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